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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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	:
CAROLYN LOPEZ, individually and as	:
Administratrix of the estate of	:
CARLOS LOPEZ, deceased,	:
	:
Plaintiff,	No. 1:05-CV-03624 (RML)
	:
-against-	:
	:
THE CITY OF NEW YORK, and "JOHN	DEFENDANT'S REQUESTED VOIR
DOES," whose identities and numbers are	<u>DIRE</u>
presently unknown but who represent	:
police officers and non-uniformed police	:
employees of defendant CITY OF NEW	:
YORK, both in their individual and official	:
capacities,	:
	:
Defendants.	:
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Defendant City of New York requests that the Court pose the following questions, together with appropriate followup inquiries, to the venire:

1. (a) [After identifying them] Do you know or know of any of the attorneys or anyone in any of the firms of the attorneys representing any of the parties in this trial?

(b) Some of you may have heard of Johnnie Cochran, who is now deceased. Will the fact that a law firm with which Mr. Cochran was once affiliated is representing plaintiffs affect your view of the case, one way or the other?

2. Do you know or have you heard of plaintiff Carolyn Lopez or her son, Carlos Lopez, who is now deceased? [If yes] What do you know or have you heard?

3. The defendant is the City of New York. Have any of you had any disagreements or dissatisfaction with the City or its government? Have any of you had any disagreements or dissatisfaction with any governmental agency, whether or not the City? [If so, obtain specifics and ask how it will affect this case.] Will the fact that this case involves an individual against the City affect your judgment of this case?

4. It is expected that one or more of the following people may testify [insert parties' witness lists]. Do you know or have you heard anything about any of these people? [If yes, obtain specifics.]

5. This case involves a police shooting that caused the death of Mr. Lopez. How will the fact that Mrs. Lopez is suing the City for her son's death affect your view of this case?

6. Have you or a close relative or friend ever been:

- (a) convicted of a crime?
- (b) involved in a shooting?
- (c) arrested, except for a minor traffic offense?

[Obtain particulars for any affirmative answers.]

7. Have any of you or a close relative or friend had any negative experiences with law enforcement that you have not already disclosed? [If yes, obtain particulars.]

8. Have you or any close relative or friend ever been a party to a lawsuit or contested administrative proceeding (other than a domestic relations matter), either as a plaintiff, a defendant, or a witness? [If yes] What type of lawsuit was it and what was your involvement? What was the disposition of the case? Were you satisfied with the outcome? How will that involvement affect your view of this case?

9. How do you feel about the police?

10. Have you had any training or education or have you ever worked in law? in medicine or related fields? [If yes, obtain particulars.]

11. Have any of you been trained or worked as an EMT or paramedic, either for compensation or on a volunteer basis? [If yes, obtain particulars.]

12. What is your educational background? What did you study in school?

13. What do you do? What jobs have you held over the last five years? [For retirees or people who are unemployed, same questions for previous employment.]

14. What do the people living in your household do? [For retirees or people who are unemployed, same questions for previous employment.]

15. To what social, civic, or other organizations do you belong?

16. In what village, town, or borough and neighborhood do you live? Are you familiar with the area around Marcus Garvey Blvd. and Gates Avenue in Brooklyn? [If yes, how?]

17. Have you been a juror? Was there anything about that experience that would affect your view of this case?

18. If there is anything you did not tell the Court previously that might affect your ability to serve as an impartial juror in this case, please raise your hand and I will inquire further at the bench.

Dated: New York, New York
June 24, 2011

A handwritten signature in black ink, appearing to read 'Ira G. Greenberg', is written over a horizontal line.

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CERTIFICATE OF SERVICE

I certify that on the 24th day of June, I caused a true copy of the attached requested voir dire to be served upon:

Gerard A. Lucciola, Esq.
The Cochran Firm
Attorneys for Plaintiff
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by first-class mail.



IRA G. GREENBERG